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9 Attorneys for Plaintiff
Med et al., Inc.

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12

13 Med et al, Inc.,
14 Plaintiff,
15
16 v.
17 Impresa Products, LLC,
18 Defendant.

CASE NO. 4:23-cv-3574-JSW

**STIPULATION AND [PROPOSED]
ORDER POSTPONING CASE
MANAGEMENT CONFERENCE**

DEMAND FOR JURY TRIAL

1 Plaintiff MED et al, Inc. (“Plaintiff”) and Defendant Impresa Products, LLC
 2 (“Defendant,” and with Plaintiff, the “Parties”), by and through their undersigned counsel of
 3 record, hereby stipulate as follows:

4 **WHEREAS**, on July 19, 2023, Plaintiff filed the Complaint in this action;

5 **WHEREAS**, Defendant answered the Complaint on September 29, 2023;

6 **WHEREAS**, a Case Management Conference is currently scheduled for October 20,
 7 2023, requiring submission of a Case Management Statement no later than October 13, 2023 and
 8 any request for rescheduling be filed by October 10, 2023 (ECF No. 12; Civil Standing Order);

9 **WHEREAS**, the Parties, through counsel, have been involved in active discussions
 10 regarding settlement of this action, have agreed in principle to terms for settlement, and are
 11 presently engaged in efforts to negotiate the final form of a written settlement agreement;

12 **WHEREAS**, the Parties anticipate that this matter will be dismissed soon after a final
 13 settlement agreement is executed;

14 **WHEREAS**, there have been no prior extensions of the Case Management Conference;

15 **WHEREAS**, there were two prior stipulated requests to extend the time for Defendant to
 16 Answer the Complaint;

17 **WHEREAS**, the undersigned Parties respectfully submit that there is good cause to defer
 18 the Initial Case Management Conference and associated deadlines (e.g., to submit a case
 19 management statement or engage in further meet-and-confer efforts related thereto) by at least
 20 thirty (30) days and until a time that is convenient for the Court;

21 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, subject to
 22 approval of the Court, that:

23 1. The Initial Case Management Conference currently scheduled for October 20,
 24 2023 is vacated and will be rescheduled to a later date as convenient for the Court. All related
 25 deadlines, including all deadlines set forth in the July 28, 2023 Order Setting Case Management
 26 Conference (ECF No. 12), will be continued accordingly.

1 Dated: October 10, 2023

Respectfully submitted,

2 /s/ Aaron R. Hand

Aaron R. Hand

3 *Counsel for Plaintiff MED et al, Inc.*

4 Dated: October 10, 2023

Respectfully submitted,

5 /s/ William P. Cole

6 William P. Cole

7 *Counsel for Defendant Impresa Products, LLC*

8
9 **ATTESTATION**

10 I attest that all signatories listed above, and on whose behalf this Stipulation is submitted,
11 have concurred in and authorized filing of the Stipulation.

12
13 /s/ Aaron R. Hand

Aaron R. Hand

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17 **ORDER**

18 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED.

19
20
21 Dated: _____, 2023

22 _____
23 Honorable Jeffrey S. White

24 UNITED STATES DISTRICT JUDGE